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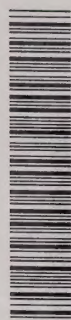
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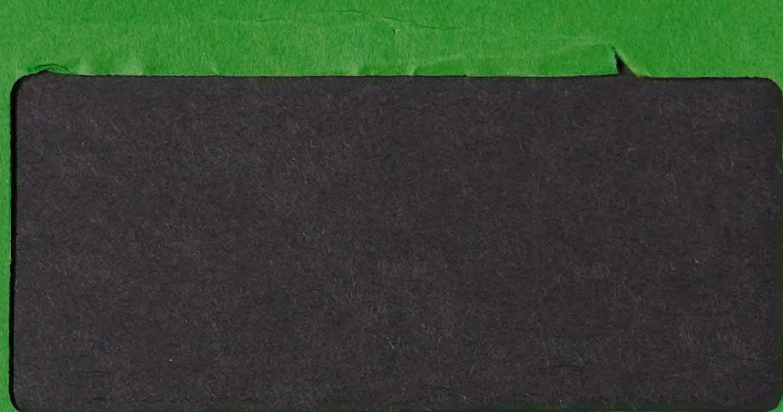
BY

THE CONSERVATION COUNCIL OF ONTARIO

Funding Program Report



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ROYAL COMMISSION ON THE NORTHERN ENVIRONMENT

J.E.J. FAHLGREN, COMMISSIONER

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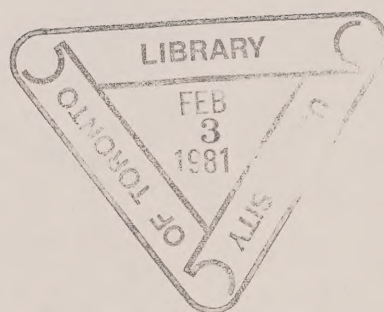
SUBMISSION

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February 1980

THIS PUBLICATION HAS BEEN PREPARED WITH THE FINANCIAL ASSISTANCE OF THE ROYAL COMMISSION ON THE NORTHERN ENVIRONMENT'S FUNDING PROGRAM. HOWEVER, NO OPINIONS, POSITIONS OR RECOMMENDATIONS EXPRESSED HEREIN SHOULD BE ATTRIBUTED TO THE COMMISSION; THEY ARE THOSE SOLELY OF THE AUTHOR(S).



THE CONSERVATION COUNCIL OF ONTARIO

SUBMISSION

TO

THE ROYAL COMMISSION ON THE NORTHERN ENVIRONMENT

FEBRUARY, 1980

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This Submission was approved by the meeting of

the Conservation Council of Ontario on

Wednesday, February 27, 1980



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PREFACE

The Conservation Council of Ontario wishes to take this opportunity to thank the Royal Commission on the Northern Environment for its generous assistance in the preparation of this brief. The Conservation Council of Ontario is a non-profit organization dedicated to furthering the principles of conservation. Through its 37 member organizations the Council represents a total membership of over one million people. The Council welcomes this opportunity to express the views of its diverse membership on matters related to development north of 50⁰ in Ontario.

NOTE: This submission has been prepared with the financial assistance of the Royal Commission on the Northern Environment. However, no opinions, positions or recommendations expressed herein should be attributed to the Commission. They are solely the responsibility of the Conservation Council of Ontario.

EXECUTIVE SUMMARY

Positions and Recommendations of the Conservation Council of Ontario

1. Acid Precipitation

- i) The Council is vitally concerned about acid precipitation, particularly the aspect of long range transport of nitrogen and sulfur oxides which makes it of direct relevance to the North, even though no major industrial sources of acid precipitation exist north of 50°. - pp. 4-5.
- ii) The Council urges all jurisdictions involved to exercise the political will to act on this problem. - p. 5.
- iii) The Council is concerned that the acid precipitation problem from coal burning generating stations not be used to confuse what is a separate question of nuclear power. - p. 6.

2. Atikokan Generating Station Located at Marmion Lake

- i) The Council urges the Commissioner to do everything in his power to see that the Marmion Lake GS incorporates scrubbers. - p. 7.
- ii) The Council does not believe that the environmental effects of the GS will be negligible. - p. 8.
- iii) The Council disapproves of the exemption of the GS from the Environmental Assessment Act. - p. 9.
- iv) The Council is disappointed in the low level of public participation, particularly of native people, in the planning of this station. - p. 9.

3. Onakawana

- i) The Council is pleased that the Onakawana project has been designated under the Environmental Assessment Act. - p. 9.
- ii) The Commission is urged to plan an active role in ensuring that Ontario Hydro's public participation process is adequate and innovative. - p. 10.
- iii) The Commission is asked to urge that the Minister of the Environment require that hearings be held before the Environmental Assessment Board after the submission of the EA document. - p. 10.

- iv) The Council is opposed to the development of Onakawana lignite solely for power export. - p. 11.
- v) The Council deplores the attitude expressed by Onakawana Development Ltd. that the land will be improved through strip mining and reclamation. - p. 11.
- vi) The Council believes that there are several environmental concerns surrounding the project which must be carefully addressed. - p. 12.

4. Polar Gas Pipeline

- i) The Council believes that the Polar Gas proposal must be answerable to an inquiry at the provincial, as well as the federal level, and urges the Commission to recommend that such an inquiry be established by the Ontario government. - p. 13.

5. Native Hunting and Fishing Rights

- i) The Council supports the legitimacy of native hunting and fishing rights, even in some particular parks where hunting and fishing are otherwise restricted. - pp. 13-14.

6. Forest Management

- i) The Council is extremely concerned about the state of forest management in Ontario. - p. 14.
- ii) The Council applauds the efforts of the Ministry to re-integrate harvesting and regeneration and is encouraged by the passage of an amendment to the Crown Timber Act, December 20, 1979. - p. 15.
- iii) The Council is not prepared to accept further northward extension of harvesting until an adequate data base and associated regeneration technology has been established. - p. 16.
- iv) The Council opposes harvesting in areas where regeneration is not possible or is considered uneconomical. - p. 16.
- v) Some Council members are opposed to the extension of aerial spraying into the North - others are not. All are agreed that careful monitoring is required. - p. 17.
- vi) The Council stresses the potential of the forest as an energy source; however, the ecological implications of extensive utilization of forest biomass require additional study. - p. 17.

7. Great Lakes Forest Products and the Reed Limits

- i) After reviewing the events leading to the creation of the Commission and the direction the Commission has taken since, the Council believes that a full assessment of the proposed timber limits license would be best served under the Environmental Assessment Act. - p. 21.
- ii) The Commission is urged, however, to play a major role in facilitating public discussion of the proposal before commencement of the formal EA. - p. 22.

8. Nuclear Waste Disposal

- i) The Council supports the request of northerners for full public hearings into nuclear waste disposal in the North. - p. 23.
- ii) The Council believes that the very important question of reprocessing should be fully dealt with separately, and an inquiry established to examine this possibility. - p. 23.

9. Endangered Species - Flora and Fauna

- i) Comprehensive inventories should be undertaken north of 50°. - p. 24.
- ii) Consideration should be given to establishment of an ecological reserves system for the province as a whole, in addition to the parks system. - p. 24.

10. Hydroelectric Power

- i) The Council applauds the efforts of Ontario Hydro in the area of small-scale hydroelectric generation. - p. 24.
- ii) The Council is concerned about the environmental effects of large-scale hydro generation. - p. 25.
- iii) Massive alteration of the environment, as with diversion schemes, is unacceptable to the Council. - p. 25.
- iv) The Commission is urged to direct Hydro to make a full public statement of what is likely, possible or definitely not being considered vis-a-vis rivers north of 50°. - p. 25.
- v) The Council believes that there are some northern rivers which should never be developed. - p. 26.

11. Parks

- i) The Council believes that north of 50⁰ offers the opportunity to create more park land. - p. 26.
- ii) The Council feels that MNR's land use planning is not sufficient to protect the park environment from threats outside its boundaries. The Commission is urged to recommend to the government that it determine some way to regulate adjacent land uses in the parks' interests. - pp. 26-27.
- iii) The Council supports the requests of the Sierra Club and others for the creation of a waterway park on the Missinaibi River. - p. 27.
- iv) The Council also supports the Atikaki proposal and urges the Commission to examine the proposal, and act as a facilitator among the various interested parties. - p. 28.
- v) The Commission is urged to examine the Atikaki road proposal. - p. 27.
- vi) The Council endorses the resolution passed by the Red Lake Businessmen's Association with respect to the Atikaki proposal. - p. 28.

12. Recreation and Tourism

- i) The Council believes that the interests of recreational users of Crown Land must be protected and represented in the allocation of resources. - p. 28.
- ii) The Council, while recognizing the environmental impact of recreation, believes that strict regulation of recreational use is impractical and undesirable. - p. 29.
- iii) The Council supports an emphasis on extensive, resource-based recreational activities, rather than intensive facility-based recreational activities. - p. 29.

13. Land Use Planning

- i) The Council is concerned that MNR's land use planning process starts by setting targets and objectives, and then the resources are studied to see if these numbers can be met. - p. 30.
- ii) The West Patricia Land Use Plan offers an opportunity to closely examine and assess MNR's planning process. Thus the Commission is asked to carefully monitor the West Patricia planning process, to comment on its effectiveness and to suggest possible changes. - p. 31.

- iii) The Commission is further urged to play an active role in ensuring that public participation in the West Patricia process is adequate. - p. 31.

14. Jobs and the Northern Environment

- i) The Council believes that environmental protection can result in more jobs, not fewer jobs. - p. 32.
- ii) The Council supports the views of the Ontario Federation of Labour on this question. - p. 33.
- iii) The Council acknowledges that there may be short term job losses and dislocation, but these can and must be offset by retraining and relocation programs. - p. 33.
- iv) The Council urges the Commission to encourage the recognition that pollution abatement can offer employment opportunities. - p. 34.
- v) The Council is convinced that energy conservation is an especially urgent need in northern Ontario and that it offers opportunities for local employment. - p. 34.
- vi) The Commission is urged to recommend that a vigorous Research, Development and Demonstration program for small-scale renewable energy sources suitable for northern Ontario be pursued. - p. 34.
- vii) Northern "equity" questions must be rectified, keeping in mind employment opportunities and economic diversification. - p. 34.
- viii) The Commission is asked to recommend to the provincial government that it explore a supplementary program to the federal home insulation program, with special emphasis on the North. - p. 36.
- ix) The Council believes that renewable energy offers particular potential in the North. - p. 36.

PREAMBLE AND DISCUSSION OF GUIDING PRINCIPLES

In presenting this brief the Conservation Council of Ontario is operating on the basis of its principles which call for recognition of the importance of ecological balance; conservation of resources in the interests of present and future generations of human beings; protection where possible of endangered fauna and flora; insurance of people and places against the possible damage to economic and social conditions that may arise from development of resources which is not planned with full consideration of these factors; and at the same time, recognition of native rights.

In applying these principles, the Conservation Council takes fundamentally the same view of problems arising north of 50⁰ as of those south of it, and urges greater local participation in development decisions in all of Ontario, without, however, giving a veto to the local component in the discussion. Environmental, social and economic problems may appear more acute in one-industry towns in the North which are an inescapable feature of pulp and paper mill and mining developments, but they exist south of 50⁰ too.

The Conservation Council is supportive of the concerns that northerners have expressed to the Royal Commission on the Northern Environment at its Preliminary Hearings, and as set out in the Issue Papers. The Council recognizes that the Issue Papers are not position documents as such, but are expressions of the issues articulated by northerners and other concerned citizens. The RCNE is lending a legitimacy and a voice to those concerns.

It is inherent in the nature of many resource-based industries that they need to be large in scale to be economic. There are also cases where a smaller scale of development is possible, and such enterprises should be encouraged as a means of diversifying local economies. There are many members of the Council who feel that development which is smaller in scale, more appropriate in its technology and controlled, where possible, by northerners would be of benefit to people who make their home in the North and to the northern environment itself. Such a mixture of development, both large and small, would provide welcome diversification to the northern economy.

The Conservation Council believes that northerners must be involved in making the decisions which will affect their lives. Some hesitation, and perhaps concern, has been expressed by some Council members on this question of northerners making the decisions affecting their own locale without regard to overall provincial interests and without the advice of others who have learned from past mistakes. This was due, in part to the concern that northerners might not always make the most environmentally sound decisions. Just as workers have been forced to support decisions that are harmful to the environment in many cases when their jobs are felt to be at stake, so too have municipal councils, north as well as south, found

themselves supporting polluting industries. However, choosing between pollution and no job is not a real choice. Northerners should not be put in such a position.

An example of the kind of creativity and concern for the environment with which northern communities respond when faced with real options, is found in the submission of the Town of Sioux Lookout at the Preliminary Hearings of the RCNE.¹ To quote from that submission:

"There is a general feeling--perhaps unjustified, perhaps not--that the residents of the area have little to gain from large-scale developments, and that these have, historically, served only the interests of the corporate investors and a few local entrepreneurs."

It goes on to say:

"The major interest of the town is in the attraction of small-scale industry which would produce for local and specialty markets, provide a more balanced local economy and offset predicted declines in some types of service employment."

In reference to a specific industry the brief states:

"The woods industry has lately proved to be the most controversial area of economic activity in this region. Bluntly stated, this is because the woods have in many cases been stripped rather than harvested; and a very lively concern is therefore evinced by many, that the resource will be irrevocably depleted if harvesting concepts and methods are not fully adopted. It is our position that the physical environment of the hinterland must be preserved in as near-natural a state by full scarification and regeneration as is possible. If the cost of logging rises as a consequence, that rise will, we feel, only impose a temporary disadvantage. Sooner or later all the wood-producing areas of the world will have to make similar commitments to regeneration--particularly as wood once more becomes an energy resource."

And finally:

"We want a stable wood-harvesting and primary-processing industry based on 100% regeneration and return to the natural state. We are keenly interested in alternative uses for wood eg. to produce methanol for use as fuel or chemical feedstock."

Where possible, several small-scale industries are preferable to a single large-scale development. Long-term locally controlled industry is more likely to feel a responsibility to an individual community and the maintenance of the resources which support it, than a company where those who make the ultimate decisions may never have visited the community. Renewable resources are preferable to non-renewable resources both for ecological reasons and for the long term stability of the local economy. Even renewable resources, though, are finite if not managed properly.

CONCERNS

Having summarized the philosophy by which its submission will be guided, the Conservation Council will discuss its concerns with respect to the northern environment on an issue by issue basis.

1) Acid Precipitation

Perhaps the most significant environmental issue facing us today is acid precipitation. The Conservation Council of Ontario cannot emphasize enough its concern over acid precipitation. Acidification of lakes and rivers, destruction of fish species, and damage to vegetation are only the most obvious of its environmental impacts. Human health impacts have also been detected, eg. high levels of heavy metals in drinking water which has been standing in lead and copper pipes.

As one of the sponsors of the international Action Seminar on Acid Precipitation recently held in Toronto, the Council is abundantly aware of the problem. We are also aware that what is in reality an environmental issue has become a political issue. The acid precipitation problem can be solved.

The technology exists; what is required is the will to act. As is so often the case in environmental questions, the obstacle is cost. The issue is further complicated by questions of international diplomacy. The Conservation Council urges the governments involved to set aside their jurisdictional prejudices and approach the problem with a resolve to act regardless of the action or inaction of others. In such cases, often the best inspiration to others to act is for someone to make the first move.

One of the major factors associated with acid precipitation is the phenomenon of long range transport. A recent joint U.S.-Canada report on the Long Range Transport of Air Pollutants outlined the nature of the problem:

"The effects associated with long-range transport arise through the accumulation of material over a long period of continuous deposition. This accumulated deposition is termed 'loading' and the concern is often due to the synergistic or additive effects of loadings of a range or combination of materials. Cumulatively, this can cause a degree of environmental degradation that would remain unsuspected as a result of the ambient concentrations of any one of the pollutants easily and directly measurable. Acidification of poorly buffered lakes and coincident elevation of toxic metal levels in the lakes are an example of the concurrent impacts of long-range transport of sulfur and nitrogen oxides together with trace metals."²

Two aspects of this phenomenon are of direct relevance to northern Ontario. First of all, though no significant industrial sources of sulfur dioxide or nitrogen oxides exist north of 50°, the long range transport of these pollutants means that deposition occurs in the North, posing a serious threat to a tourist industry which represents a significant element in the northern economy. Secondly, increases in levels of heavy metals would have a particularly undesirable impact in the Northwest, where mercury levels are already intolerably high. The report on Long Range Transport of Pollutants states:

"Elevated concentrations of aluminum, manganese, zinc, cadmium, lead, copper, and nickel have frequently been observed

in acidified lakes. The abnormally high concentrations are apparently due in part to direct deposition with precipitation as well as to increased release (solubility) from the sediments."³

As the Indians of Treaty #3 put it at the Preliminary Hearings of the Commission:

"...we have far too much mercury in our river systems already. We do not need anymore."⁴

Acid precipitation will increasingly be an issue as both Canada and the United States attempt to resolve the energy crisis. To quote from the Hon. Harry Parrott:

"As things now stand, we can expect more use of fossil-fuels, esp. coal and oil, and therefore more potential production of sulphur and nitrogen oxides...The generation of power is one major example. I have been led to believe that the U.S. is turning away from nuclear power plants because of public opposition. This means a major commitment by alternative to coal-fired power plants."⁵

This is a difficult issue which must be resolved if further significant environmental damage is to be avoided. It is evident that the potential for acid precipitation pollution from coal-fired power plants will be used as a major argument in favour of nuclear power. Regardless of what position on nuclear power is taken, it is crucial that this dispute not be used to justify environmental damage from acid precipitation. Emissions from coal-fired plants can be reduced to a tolerable level through the use of pollution control devices such as scrubbers. As well, newer technologies such as fluidized fuel beds are being developed to reduce the production of emissions. It is significant that the U.S. congressional Office of Technology Assessment has concluded that regulations under the Clean Air Act do not impose a major constraint on meeting national goals for coal development. Standards can be met through the use of scrubber technology.⁶

2) Atikokan Generating Station Located at Marmion Lake

The Conservation Council is extremely disturbed that the current plan for the Marmion Lake generating station near Atikokan does not incorporate scrubbers. The Council urges the Commissioner to do everything in his power to ensure that this decision is reversed. We note with approval that the Commissioner has indicated his support for such a move (see Appendix I).

While the Marmion Lake generating station is located 90 mi. (144 km.) south of the 50th degree of latitude, the Commission is urged to focus its attention on this issue. Justification for such consideration lies in the Commission's Terms of Reference, Objectives and Work Program (July 1979), in which it is stated that the Commission will address issues in a "secondary area of concern" south of 50° under specific circumstances. Of particular relevance is where "Effects of local conditions or developments [which] extend into the primary area (such as job opportunities or pollution)".⁷

According to Dr. J. R. Kramer, an expert in acid precipitation who testified at the Commission's Preliminary Hearings:

"...[F]rom our estimates, long range transport and deposition of atmospheric pollutants extend at least to 55 north latitude in this area of Ontario. This is the lower limit because we have not measured the deposition any further than that. The deposition level over the northwestern part of Ontario at present is sufficient to marginally destroy the accumulative capacity of the most susceptible lakes...Emissions from proposed developments must be considered as adding to this background which is at present marginal for the most susceptible lakes."⁸

In other words, even at present deposition extends well into the Commission's primary study area. Given what is known about the long-range transport of airborne pollutants, what may be acceptable levels of sulphur dioxide emissions from Marmion Lake when considered in isolation, must be considered in terms of their cumulative and synergistic effects in combination with current

levels of local and long-range origin. For this reason the Conservation Council, unlike Ontario Hydro, is not convinced that the effects of Marmion Lake will be negligible.

Nor is the United States. Disagreement between Minnesota and U.S. federal authorities and their Canadian counterparts over the absence of scrubbers at Marmion Lake has been well-documented. It is the sincere hope of the Council that Marmion Lake is not being used by Canadian federal and provincial authorities as an ace card in negotiations towards an international treaty agreement (See Appendix I).

The Atikokan situation is also relevant to the Commission's mandate through the requirement that an issue south of 50° have "Direct relevance to conditions and issues considered by the Commission in its primary area of concern (such as experience with problems created by resource industries, or new approaches to economic development)".⁹ Atikokan is representative of the boom-bust syndrome which has plagued the North and as such provides a useful lesson for the area north of 50°. In fact, the economic and social hardships facing the town of Atikokan were cited by Ontario Hydro as a significant consideration in their decision to go ahead with the Marmion Lake G.S. This was in spite of the acknowledgement by Hydro that cancellation would have been the most economic alternative.¹⁰

It should be pointed out that the Conservation Council has no desire or intention to deprive the people of Atikokan of whatever economic benefit can be derived from the Marmion Lake GS. The Conservation Council does not recommend that the generating station be cancelled if the need for it is established; only that proper pollution control technology in the form of scrubbers be installed. The use of high stacks has been clearly proven (Sudbury, etc.) to

be an unsatisfactory means of pollution control; all that is accomplished is dispersal of the emissions over a wider area. This has, in fact, contributed heavily to the current situation of long-range transport of air pollutants. The notion that dispersal is a satisfactory solution is particularly unacceptable in view of the generating station's location 12 mi. (19 km.) from the northern boundary of Quetico Provincial Park and 38 mi. (61 km.) from the northern edge of the Boundary Waters Canoe Area in Minnesota.¹¹

Finally, the Conservation Council wishes to register its disapproval of the fact that the Marmion Lake GS was exempted from the Environmental Assessment Act. The Council believes that this was a significant abdication of the principles of environmental assessment to which the province committed itself through the passage of the Act. The Council also wishes to register its concern with the low level of public involvement which has occurred to date, particularly with respect to the native people of this area. It is suggested that a full environmental assessment under the Act could have avoided this unsatisfactory situation.

3) Onakawana

The Conservation Council wishes to express its approval of the fact that the Onakawana project was designated for review under the Environmental Assessment Act on February 24, 1978. The Council also applauds the intention of the Commission to "...play an observing and counselling role in this first opportunity to test the Environmental Assessment Act process in relation to a major non-renewable resource project in the study area".¹²

It appears, however, that the Commission may be deprived of an opportunity to do so because the Environmental Assessment documents for the power generating station, mining development and transmission lines are not scheduled to be sub-

mitted to the Minister of the Environment until mid-1981.¹³ In the meantime, it is the intention of Ontario Hydro to conduct an extensive public participation program so that the public will be involved in responding to the project before the completion of the EA document. The Council urges the Commission to play an active role at this stage to ensure that the public participation process is both adequate and innovative, since the Commission is unlikely to be still in existence to participate after the submission of the EA document. The Council calls on the Commission to urge the Minister of the Environment to require that hearings be held before the Environmental Assessment Board after the submission of the EA document.

The Council is also concerned about the rationale behind and justification for the Onakawana proposal. At the time of the Preliminary Hearings Onakawana Development Ltd. stated that there were two options for the end use of the lignite it proposed to strip mine. One was the construction of an on-site coal generating station which could provide power through the Ontario Hydro grid system. Alternatively, the coal could be briquetted and shipped by train to serve industrial power needs elsewhere. At that time, however, Ontario Hydro was not interested in constructing a power generating station at Onakawana.

In a speech delivered to the Cochrane Board of Trade on February 9, 1979¹⁴ Premier Davis stated that "...I have asked Ontario Hydro to look seriously at this opportunity". This statement came after the Premier had outlined the economic advantages to be gained from the Onakawana development, particularly locally--"However, we must also face the reality that--based on preliminary data--Ontario does not require any additional electrical generating capacity for its own purposes, beyond that currently approved, until at least the early 1990's...And I don't want to mislead anyone into believing that doing further

work on a generating station at Onakawana is supported by the current and forecast depressed demand for electricity."

The Premier then stated:

"Even in the face of the current surplus electrical capacity, we hear reports emanating from the United States that unless petroleum demand is curbed, the industrial nations could have difficulty meeting their energy needs next winter. Fortunately, Ontario is particularly well placed and could well be called on to supply increasing supplies of electricity...If Northeastern Ontario is to reap the benefits of development, and if Onakawana is to be ready to proceed in a timely fashion, it may require substantial readjustment in the way we think about Hydro's generating and transmission capacity. It may require Hydro to be even more aggressive in promoting additional energy sales to the United States."

It was at this point that the Premier directed Hydro to "look seriously at this opportunity". The Conservation Council is concerned that the justification for the Onakawana development is not the need for power to be used in Ontario, but solely for export. The Premier himself stated that the power from Onakawana is not needed in Ontario. The Conservation Council can not accept the exploitation of a non-renewable resource simply for export purposes, at a time when it is not required by the province. The time may well come when Onakawana coal is required by Ontario and we will have squandered it. The Conservation Council opposes the Onakawana development if the justification is export sales.

There are several other aspects of the Onakawana proposal which concern the Council. First of all, the Council deplores the attitude of Onakawana Development Ltd. that the area is of little value and will be improved through the strip mining and reclamation process. For example in discussing the cost of environmental studies ODL stated: "For land which has little value to man today, that is an expensive price to pay merely to restore it to its present

condition. Fortunately, at Onakawana, there is a confident possibility that after reclamation, the area will have measurable increase in value as a recreation area for man and productive habitat for wildlife."¹⁵ The Council is not convinced that reclamation will be as satisfactory as ODL maintains. Furthermore the effect on the total ecosystem of the draining of swamps, etc., cannot be so easily ignored.

There are several other environmental concerns associated with the Onakawana proposal. Among these is the potential for acid precipitation from the coal-fired generating station. It is urged that scrubbers be incorporated if a generating station is built. As well, the implications for the watershed from cooling requirements (in particular suspension of lignite in the water) and acid leaching from tailings piles must be carefully addressed.

The Onakawana proposal brings into focus the whole question of mining development north of 50°. As well as lignite, there are substantial deposits of kaolin clay, silica sand, gypsum and niobium and possibly oil, gas, uranium, or lead-zinc, in the Moose River Basin.¹⁶ If the Onakawana development goes ahead there is likely to be increased activity in these other areas of the mining sector. While acknowledging the economic potential in development of these resources, the Council stresses the need for careful environmental monitoring and protection at all stages of the mining process, from planning to reclamation.

4) The Polar Gas Pipeline

The Conservation Council is aware that the Polar Gas pipeline proposal is being reconsidered and that it is conceivable that it may not even pass through Ontario. Polar Gas is expected to withdraw its current proposal, filed with the National Energy Board in December 1977, and replace it with a new proposal.

According to a Polar Gas representative, four possible new routes are being considered, three of which would not pass through Ontario at all.¹⁷ For the moment, however, the Council assumes that the new route will be that which is commonly referred to as the "Y line", passing through northwestern Ontario along much the same route as the current proposal.

While it is understood that pipelines crossing provincial boundaries are under federal jurisdiction, and that the Polar Gas proposal will be reviewed by the National Energy Board, the Department of Indian and Northern Affairs, and the federal Environmental Assessment and Review Process, the Council believes that the Polar Gas proposal should also be answerable to an inquiry at the provincial level (see Appendix II). The Commission is urged to recommend to the Ontario government that it provide a forum for a comprehensive examination of the potential impacts of the Polar Gas proposal on Ontario's north. The Council disagrees with the expressed view of Polar Gas that it has no responsibility to answer to the Royal Commission on the Northern Environment.¹⁸

5) Native Hunting and Fishing Rights

The Conservation Council of Ontario supports the legitimacy of native hunting and fishing rights, whether they are based on aboriginal or treaty rights. It is the understanding of the Council that these special hunting and fishing rights exist mainly for the purposes of sustenance. There is some confusion, however, about the legal definition of sustenance. Many Council members believe that these traditional rights do not, with various exceptions, apply to commercial purposes.

The Council believes that the Province of Ontario has tended to avoid this issue and that its policies are tinged with ambiguities. While individual MNR employees most often have shown respect for native hunting and fishing

rights, the Council maintains that the native people should be given written assurance that their rights will be respected, in the form of an unequivocal statement. This may apply even in some particular parks where hunting and fishing are otherwise restricted. The Council's basic concern in this regard is with the protection of the total ecosystem. The Council recognizes the close ties between native people and the land and their cultural tradition which supports conservation of resources.

6) Forest Management

The Conservation Council is extremely concerned about the state of forest management in Ontario. The forest is only potentially a renewable resource. To be renewable it must be managed properly. Historically, the forest has often been treated as a resource to be exploited, with little thought for the future. There has been little incentive for the forest based industries or the governments of Ontario and Canada to exercise concern for the regeneration of the forest, largely because of the long time frame involved. The result has been an ever-northward expansion of cutting operations, as demand on forest products has increased.

Forest operations began in an era in which there was little legislative policy or standards related to forest regeneration. This has resulted in a failure to achieve satisfactory regeneration on a high proportion of our cut-overs. In recognition of this historical problem, the Ontario government accepted responsibility for regeneration by amending the Crown Timber Act in 1962.

In the years following this amendment, the decision of the government of Ontario to undertake much of the regeneration work itself resulted in the separation of harvesting and regeneration programs. On most sites, this

separation has made it difficult to achieve successful regeneration. Without adequate funds or personnel to carry out regeneration, and hampered by the results of cutting techniques used in harvesting, the Ontario Ministry of Natural Resources was unable to overcome these difficulties. The Ministry's own figures are that approximately one-third of the area cut regenerates naturally, another one-third is being treated for regeneration and the remaining third is not regenerating at all. Of the one-third being treated, only about 50% is successfully regenerated. And it is in this area that the failure of current management efforts is most pronounced (See Appendix III).

The Conservation Council applauds the efforts of the Ministry, through the appointment of Professor Kenneth Armson, to reintegrate the Management elements by having industry regenerate the forest to government standards with agreed upon cost-sharing. The Council is pleased that a satisfactory agreement appears to have been reached. The passage of an amendment to the Crown Timber Act on December 20, 1979 marks a strong step forward. Nevertheless adequate monitoring is essential to ensure targets for forest productivity are achieved.

An agreement, however, will not mean that the situation will be rectified overnight. What of the hundreds of thousands of acres which have been cut and left untreated or treated inadequately? Surely this has resulted in a reduction in productivity which will eventually impact on the health of the forest industry and the northern communities dependent upon it. The Council supports the position of one of its member organizations, the Ontario Professional Foresters Association as expressed to the Commission at its Preliminary Hearings in November, 1977:

"Does it make sense to continue our present practice of orderly liquidation of the forest resource south of 50°? To extend these practices north of 50° will merely delay that inevitable moment of truth dictated by our inability to compete in the world marketplace."19

The Council also supports a more recent statement by the OPFA:

"A major drawback to effective resource planning north of 50° has been the lack of an adequate natural resource data base. In general, the Ontario Land Inventory did not provide coverage in this area and was more regional in scope at best. The OPFA supports the acquisition of improved inventories in not only the vegetative component but also in areas of soils, climate and biology. In this manner lands capable of supporting intensive forestry can be ascertained and the concomitant management plans made. Land less capable of intensive management can be identified; environmental impact predictions made for harvesting and proper road layout and construction in these areas; and prescriptions for mitigation made for areas deemed to be sensitive to disturbance." (See Appendix IV)

The Council, like the OPFA, is not prepared to accept further northward extension of harvesting until an adequate data base and associated regeneration technology have been established, and until the opportunity costs are shown to be acceptable. There are members of Council who argue that the exceedingly long rotation ages of northern forests could effectively mean that commercially viable regeneration does not occur. Furthermore, some Council members are concerned that even if regeneration is commercially viable, the growth rate may be so slow that commercial harvesting may result in long term harm to flora and fauna, loss of wildlife habitat, harm to the interests of the native population and possibly other adverse ecological impacts (See Appendix V). Finally, the Council is unprepared to accept the argument that harvesting should be allowed in areas where regeneration is not possible or is considered uneconomical.

Although aerial spraying is not a particular issue north of 50° at present, many Council members are concerned that should harvesting be extended, aerial spraying not occur because environmental dangers are not justified.²⁰ Particular concern is felt for the contamination of watersheds through spraying.

However, other members, in particular the Ontario Professional Foresters Association, view aerial spraying as a legitimate management tool (see Appendix IV). They argue the establishment of successful plantations necessitates vegetation control. Optimum forest yields depend on control of insects inasmuch as there does not appear to be a surplus forest base to meet projected provincial needs without controls. Forestry requirements to date have been on limited acreages at fairly low dosages compared to agricultural requirements for spraying. As well, these operations are carried out according to the same regulations and licensing as in agriculture. Despite this, all members of Council are aware of the sensitivity of the environment to spraying and are agreed that it is necessary to continue monitoring the effects of chemical spraying wherever used in the northern environment.

And finally, the Council wishes to emphasize the potential of the forest as an energy source. Wood wastes in particular can be utilized for their energy value. That the Commissioner is clearly aware of this tremendous potential is indicated in his speech to the Hearst Chamber of Commerce. The Council is encouraged by the Commissioner's statement that:

"The potential for methanol production in the north, the number of new jobs it could create and the effect it would have on energy self-sufficiency is one part of the research my Commission is doing on alternative resource use in the north."²¹

However, the ecological implications of complete tree utilization require additional study. For example, how will the nutrients be returned to the forest floor if the slash is removed and used for methanol production?

If we are to begin the shift to a conserver society we must explore innovative alternatives to our traditional patterns of resource consumption. The forest is not limitless; we must recognize this and set about determining the best ways to utilize and conserve it.

7) Great Lakes Forest Products and the Reed Limits

The Reed Paper Ltd. proposal to build a pulp-mill complex near Ear Falls based on 19,000 sq. mi. of timber limits was the driving force behind the creation of the Royal Commission on the Northern Environment. When Reed indicated at the Commission's Preliminary Hearings that it was reassessing its proposal, what could have provided a major focus for the Commission was dissipated.

The announcement in November 1979 that Great Lakes Forest had purchased Reed's Dryden operation and was intent on gaining the 19,000 sq. mi. which comprised the original Reed proposal,²² reopened what many had believed was a closed book. There are several questions involved. The first, is whether or not the 1976 Memorandum of Understanding between Reed Ltd. and the provincial government was in fact an "asset" of Reed's which was purchased by Great Lakes. The second, is the question of whether or not the Memorandum of Understanding is still effective, since Reed indicated its "reassessment" of the proposal and the project in effect fell into a state of limbo. Since both questions are likely to be decided in the affirmative, albeit with much confusion, a third point must be raised, which is not in question. That is that the Memorandum of Understanding does not give either Reed or Great Lakes the rights to the 19,000 sq. mi.--it is only a conditional agreement pending environmental approvals.

* * * * *

At the time that the Memorandum of Understanding was signed, the government was unclear as to what approval process would be involved. The Memorandum makes provision for a single public hearing "...to be held by the Environmental Assessment Board of the Ministry of the Environment in the Dryden/Red Lake/Ear Falls area for the purpose of ensuring that the proposed development by the

Company will be environmentally acceptable".²³ The memorandum requires Reed to provide an environmental impact study for the pulpmill complex only, not the harvesting operations for the 19,000 sq. mi. It was not, however, specified under which piece of legislation the hearing would be held, the Environmental Assessment Act or the Environmental Protection Act. When questioned about this by opposition parties the following day the Minister of Natural Resources and his Deputy Minister were unable to provide an answer. Deputy Minister Keith Reynolds stated "I'm sorry, I can't answer that."²⁴ It should be pointed out that at that time the Environmental Assessment Act did not yet apply to the private sector.

Later that day the Minister of Natural Resources announced that the hearing would be held under the Environmental Assessment Act, by Order-in-Council.²⁵ On November 12, 1976, by special Order-in-Council, a regulation was passed designating Reed under the Environmental Assessment Act. The regulation applied to the harvesting operation as well as the pulpmill complex.

Treaty #9 and the opposition parties were not satisfied, however, by the designation of the Reed proposal under the EA Act and maintained pressure for the establishment of a royal commission inquiry into all resource development north of 50°.

On February 10, 1977, the Premier announced that an inquiry, to be conducted by Mr. Justice Hartt, would "...begin as soon as possible on the broad environmental, cultural, social and economic implications of proposed development in Northwestern Ontario".²⁷ An amendment to the EA Act would be introduced early in the next session to provide a framework for such a broad approach. The inquiry was to begin immediately, while the formal hearings on the proposal would proceed after completion of a forest inventory by MNR

and a comprehensive environmental assessment by Reed, to be completed within two years. "Following the completion of these impact assessments, the hearings will proceed according to the normal procedure as defined in the Act."²⁸ Presumably, it was intended that at that point Hartt would be appointed to the Environmental Assessment Board and conduct the second phase of the hearings.

This was never clarified as the Royal Commission on the Northern Environment was ultimately created under the Public Inquiries Act, not under the Environmental Assessment Act at all. When the government attempted to introduce an amendment to the EA Act in the spring session, creating the type of inquiry outlined in the Premier's February 10th statement, passage was blocked by the opposition parties. It was their intention that the amendment include an attachment requiring the closure of the English-Wabigoon River system to sports fishing. This was by-passed, however, by the government which instead created the Royal Commission on the Northern Environment under the Public Inquiries Act, by Order-in-Council dated July 13, 1977. Thus, almost 9 months after the signing of the Memorandum of Understanding, an inquiry which was to do much more than assess the Reed proposal was established.

The mandate of the Commission, as set out in the Order-in-Council creating it, includes the instruction "to inquire into any beneficial and adverse effects on the environment...of any public or private enterprise, which, in the opinion of the commission, is a major enterprise north or generally north of the 50th parallel of north latitude..."²⁹

Since its creation, however, the Commission has expressed its intent not to make decisions on specific projects.

* * * * *

Having carefully reviewed the chronology of events leading to the creation of the Commission, the Conservation Council is convinced that the formal assessment of the Reed-now-Great Lakes proposal should be held under the Environmental Assessment Act as designated on November 12, 1976. The Commission was created to facilitate public discussion of the Reed proposal in a broad context before the EA document and thus formal hearing process under the Act began. In the process, the mandate of the Commission was broadened. It is not clear to the Council that the role Mr. Justice Hartt was to play in formal hearings under the Act was ever definitively stated. Given the evolution of the Commission's mandate and the direction that the Commission has taken since its creation, the Council believes that a full assessment would be best served under the EA Act. Nevertheless, the Commission does have a major role to play in facilitating public discussion of the proposed timber limits licence before commencement of the formal EA. The Council strongly urges the Commission to do so, and offers the opinion that this was in fact the original intent of the Commission.

The Conservation Council is not irreversibly opposed to the future issuance of a licence to Great Lakes; however, its prime concern is that the conditions set out in this brief under the Forest Management section are met first, before extensions of timber limits are considered. The Council wishes to express its concern, though, over the uncertainties surrounding the realization that Great Lakes was interested in the proposed Reed limits. Surely this is something which the government should have been clear on before negotiating the purchase of Reed by Great Lakes. The Council finds it difficult to believe that 19,000 sq. mi. of uncut forest were "overlooked" in the process.

8) Nuclear Waste Disposal

Northwestern Ontario has been identified as the most desirable site for disposal and/or storage of nuclear wastes. Dr. Kenneth Hare in his report on "The Management of Canada's Nuclear Waste" concluded that underground disposal in geological formations of igneous rocks called "plutons", preferably in a remote northern location, was the best option for dealing with radioactive wastes. At the Preliminary Hearings in Toronto, Dr. Hare spoke more specifically of the preferred location:

"Although at no point during the report do we say where, that actually means northern Ontario west of a line from Wawa to the Attawapiskat River."³⁰

The Hare Report, in fact, contained some very significant and perceptive comments with respect to selection of a site:

"The latter criterion--remoteness from settlements--will probably be preferred by most members of the Canadian public. Few people want to see the repository close to their homes. Hence, the inhabitants of densely settled southern Ontario are likely to opt overwhelmingly for disposal in remote, central or northern areas...A decision to locate the repository in central or northern Ontario, however, may be resisted by local populations, environmentalists, conservationists, wildlife specialists and the recreation industry. In some areas it may also be opposed by native people's organizations. 'Why should we accept noxious wastes from the demands of city-folk down south?' This familiar cry will be raised wherever in northern areas the repository is finally placed."³¹

The predictive powers of this statement have already been proven. Consideration by Atomic Energy of Canada Limited of Atikokan as a test drilling site led to considerable public debate. A coalition of groups in Northwestern Ontario opposed to AECL's test drilling was formed; 18,000 people signed a petition demanding "open public hearings throughout the region" before any decisions were made. The Atikokan Town Council gave its assent to test drilling by AECL. In response "1680 people, almost twice the number of voters in the

last municipal election, have signed a petition in opposition."³²

The question of disposal of nuclear wastes in Ontario is clearly a contentious one. Much of the concern in the North is the reaction predicted by Dr. Hare: that the North would be unwilling to accept the South's wastes. They certainly are not prepared to do so without full public hearings. Although nuclear power is one of the issues over which Council members are divided, Council supports the request of northerners for a full public hearing into nuclear waste disposal.

The issue is further complicated by the fact that any site being considered could well be the site of a future nuclear fuel complex. Although a decision on reprocessing has not been reached, this is an option which AECL (and Ontario Hydro) is clearly hoping for (See Appendix VI). According to Dr. Hare:

"The program to develop a permanent disposal method for fuel cycle wastes has proceeded on the assumption that the irradiated fuel would be processed to recover the plutonium and that the wastes would be those arising from such processing. Little detailed attention has been given to the idea of immobilizing and disposing of the irradiated fuel directly."³³

These factors must be kept firmly in mind when responding to the notion of test drilling in northwestern Ontario. The possibility of reprocessing ought not to be a part of any search for a way--and a place--to deal with nuclear wastes. The Council believes that a full inquiry should be established to look at the separate issue of reprocessing.

9) Endangered Species - Flora and Fauna

The Conservation Council has a very special interest in the protection and preservation of endangered species of flora and fauna. The Commission is referred to the Council's "Brief on Wildlife and Endangered Species Management", July 1976.³⁴

Comprehensive inventories of flora and fauna should be carried out in Ontario north of 50°. Such inventories would be directed towards identification of ecologically sensitive areas, endangered species, significant habitats, or unique communities which are deserving of protection and preservation, with a view to creation of a sound ecological reserves system.

Much of the work already done in this regard focuses on Southern Ontario where the need to act has been perceived by larger numbers of people. Relatively little research has been done north of 50°. Existing data sources such as reports of the Canadian Wildlife Service and data base studies of Polar Gas may contribute some of the required information, but more effort will certainly be required.

Consideration should be given to the preservation of representative habitats as well as those which are unique. The park system is inadequate as the sole means of protecting this spectrum of ecological concerns; the recreational and resource use of parks may in some instances conflict with the objectives of biological preservation. Similarly forest resource inventories, while vitally important, may not be adequate for the purposes of identification and preservation of endangered species.

Serious consideration needs to be given to the question of an ecological reserves system for the province as a whole, with special emphasis on the area north of 50°. The Council calls on the Commission to stress this need to the government of Ontario.

10) Hydroelectric Power

The Conservation Council applauds the efforts of Ontario Hydro in the area of small scale hydroelectric generation. In particular, research efforts with mini-Hydellles (small scale generators suspended in rapids) indicate a growing

concern for environmentally benign production of power for local needs. The Council sees hydraulic power generation as a needed and useful tool for meeting energy needs.

The Council is, however, aware of the environmental effects of large scale hydroelectric generation, as well as the past socio-economic impacts such development has had on native people. The Commission as well knows of these undesirable impacts, having heard lengthy statements from native people and others at the Preliminary Hearings. In the past, hydroelectric developments have not been accompanied by adequate respect for the legitimate interests of those who are immediately affected. Flooding of burial grounds or wild rice areas without consultation or compensation is unacceptable.

One of the major problems associated with large scale hydroelectric developments is the regulation of water levels. The effect of this is repeated destruction of areas which are not always under water, but are only intermittently flooded. The Commission heard a great deal from the native people of Treaty #3 about the negative effect water fluctuations regulated by Lake of the Woods Control Board have on wild rice crops.

Hydroelectric power certainly merits careful consideration as a relatively clean and non-polluting source of power. There are, however, environmental implications which cannot be ignored. Massive alteration of the environment as with diversion schemes, is unacceptable to the Council.

It seems at this point that diversion schemes for north of 50° are unlikely; however, it is extremely difficult for the public to get a clear grip on what is likely or possible in terms of hydroelectric developments in the north. For this reason, the Council urges the Commission to direct Ontario Hydro to make a full public statement of what is likely, possible or definitely

not being considered with respect to damming and/or diversion of all or parts of such northern rivers as the Albany. To say that nothing is being planned, that only office studies are being carried out, is inadequate.

Finally, the Council wishes to reiterate its position that there are "wild rivers" (eg. the Missinaibi and the Winisk) in Ontario north which should never be developed because of their recreational assets, cultural character and historical heritage.³⁵

11) Parks

The Conservation Council is committed to the preservation of wilderness through the creation of parks. The cultural, recreational, aesthetic and ecological values of parks are well documented in the OMNR's Ontario Provincial Parks Planning and Management Policies (1978). The Council believes that Ontario needs more park land, and that because of its largely wilderness state, Ontario north of 50° offers opportunities to protect and preserve the environment by means of the establishment of parks.

The setting aside of park land does not, however, automatically assure protection. The Council has often expressed its concern that activities outside park boundaries can have serious adverse impacts within a park. This was in fact a concern expressed by the Council and several other groups and individuals with respect to the planning of Polar Bear Provincial Park. The Ministry of Natural Resources is clearly aware of this problem, and we respectfully acknowledge this. However, the Ministry's response that this will be provided for during the working out of the local land use plan is, we feel, inadequate.³⁶ MNR's land use planning is not a sufficient safeguard for the protection of a park environment from outside threats. MNR's planning process must reconcile numerous land use interests, only one of which is parks, and apparently must still meet targets and objectives originating with TEIGA's

Design for Development. The Council urges the Commission to recommend to the government that it determine some way to regulate adjacent land uses in the parks' interests.

The problem of adjacent activities threatening the quality of the park environment is particularly pronounced with respect to waterway parks. The Council believes that the major wild rivers of Ontario's north must be preserved. For this reason, the Council supports the requests of the Sierra Club and others for the creation of a waterway park on the Missinaibi River. The actions of MNR towards this end, creating the Missinaibi River Park Reserve, are applauded. However, it is hoped that when the final boundaries for the future park are announced, they will be adequate to protect the river. Major dams upstream or downstream from wild river parks are unacceptable as are discharges of industrial wastes upstream.

The Conservation Council also supports the Atikaki proposal for the creation of a wilderness park straddling the Ontario/Manitoba border. The Council urges the Commission to examine the Atikaki proposal carefully and to act as a facilitator among the various interests involved. The Council believes that the members of the Atikaki Coalition have put forward their proposal in the spirit of cooperation and give and take. They have attempted to satisfy the misgivings of the forest industry that needed wood volume would be lost. The Commission is urged to examine the Atikaki Road proposal (see Appendix VII) which would involve construction of a road connecting Red Lake directly with Kenora. The Council is unable to assess this proposal, but suggests that it is worth careful consideration. The construction of such a road would also meet the expressed desire of many Red Lake residents for direct access to Kenora.

In the meantime the Council endorses the resolution passed by the Red Lake Businessmen's Association asking MNR "...to designate the area defined by the original Atikaki Park Proposal as a Park Reserve, in order to allow an in-depth study to be made as to the formation of a viable park in the future".³⁷ (See Appendix VIII).

12) Recreation and Tourism

The Conservation Council believes that though parks are an important tool in protecting and providing access to outdoor experiences, land outside parks is equally important for recreation. Use of Crown Land for recreational and tourist activities is significant and the Council applauds the interest the Ministry of Natural Resources has shown in this area by commissioning the Crown Land Recreation Study.

The Crown Land Recreation Study identifies the many conflicts which exist between recreationists and various resource extraction industries, among recreationists themselves and among various branches of the Ministry. The result of competition for the resource base has often been overuse--and the need to reconcile the legitimate demands of different users. The authors of the Crown Land Recreation Study feel, and the Conservation Council concurs, that the interests of recreational users must be protected and represented in the allocation of resources. Back country canoeing or cross-country skiing and snowshoeing must be recognized as legitimate land uses, and considered simultaneously with logging allocations. The Council wishes to quote what it feels to be a particularly pertinent conclusion of the Crown Land Recreation Study:

"Throughout this study, we have reiterated our view that more integrated planning and management of Crown Land is the key to more effective delivery of Crown Land recreational opportunities.

It was made evident to us in Phase I that the traditional organization of the Ministry of Natural Resources, with its emphasis on disciplinary specialization, has been a tremendous impediment to the development of an effective Crown Land recreation programme... There are two dimensions to the need for integrated planning and management for Crown Land recreation. The first is the need for full recognition of the economic and social benefits of recreation along with the benefits of resource production in policy planning, Strategic Land Use planning and District and local area planning. The second is the need for full integration of recreational considerations in forest management planning, road location, mine location, timber harvesting management, forest regeneration management, mineral extraction management, etc. A Ministry organization more directed towards integrated resource management would be substantially more successful in meeting both of these needs."³⁸

(see Appendix IX for a summary of the Crown Land Recreation Study).

While stressing the significance and legitimacy of recreational uses of Crown Land, the Council is not unaware of the environmental impacts of such use. The increasing numbers of recreationists utilizing the land and its resources will have pronounced impacts. The Council has already provided the Commission with a fairly lengthy discussion of this problem in its report on Environmental Guidelines for the Recreational Use of Northern Ontario's Back Country Areas.³⁹ It only wishes here to reiterate its conclusion that strict regulation of recreational use is impractical and, to many, undesirable. Thus,

"It is apparent that a large gap exists in the management of recreation lands in Ontario--a gap that can only realistically be bridged by encouraging the recreationist to voluntarily minimize his/her impact on the land. This is done by making such people aware of the need to preserve back-country and of the techniques that they can use themselves to ensure that their activities are not environmentally harmful."⁴⁰

Finally the Council wishes to convey its support of an emphasis on extensive, resource-based recreational activities, rather than intensive facility-based recreational activities. It is hoped that the Ministry of Natural Resources will pursue such an emphasis.

13) Land Use Planning

The Conservation Council acknowledges the efforts of the Ministry of Natural Resources towards comprehensive land use planning through its Strategic Land Use Planning process. However, the Council has serious questions about the efficacy of that process.

One of the primary goals of land use planning must be the resolution of conflicts between various uses and users of the resource base, in a way which is both equitable and productive. This is extremely difficult and requires truly innovative planning. The Council is concerned that MNR's SLUP process, operating as it does from the premise of the Ministry of Treasury, Economics and Intergovernmental Affairs' (TEIGA) Design for Development, cannot effectively meet local needs. MNR is limited in its planning by objectives and targets set in the Design for Development program, and in various questionable population projection figures. The Council agrees with the Ministry that it is important first to have a picture of the needs of the province as a whole. However, it is concerned that targets and objectives are set beforehand; then the resources are studied to determine whether these targets can be met. This appears to the Council to be a rather backward way of approaching the problem. The Council believes that this approach imposes a commitment to developing a region in a certain way, which may not in fact be the best use of the resources that exist. Though targets and objectives can be revised if the resource or social base does not justify them, there is nevertheless a tendency to make the resources and people fit the targets.

The West Patricia Land Use Plan offers an opportunity to observe how the planning process operates at the local level. Planning at the local level in the West Patricia area was prompted by the Reed proposal; that in itself is

indicative of the extent to which the planning process is dictated by pre-determined objectives. The Commission is urged to play a major role in monitoring the West Patricia planning process, to comment on its effectiveness and to suggest possible changes. The public participation aspect of the planning process is particularly important and the Commission is asked to consider assuming a primary role in this. Thus, the Commission could play both an active and a passive, monitoring role in West Patricia.

Local land use planning in the North poses a challenge to seek innovative solutions. Small-scale, "environmentally appropriate" technology should be encouraged, as the first step towards a truly diversified economy.

14) Jobs and the Northern Environment

Just as the less complex ecosystems of the North render many species of flora and fauna more vulnerable to environmental damage, so too the less complex human economies of the North render individual northerners and northern communities more vulnerable to job loss and industry closure. In most northern communities and regions there are few or no employment options. Northerners justifiably feel very vulnerable whenever any existing northern industry threatens to close, to forego expansion, to reduce operations or to change locations.

These fears are compounded by an additional element in the northern economy, ie. the predominance of extractive industries, owned and managed by non-northerners and often, because of high operating costs, economically marginal in comparison with similar operations elsewhere. Extractive industries, especially those in marginal locations, are notoriously susceptible to boom and bust cycles. When economies contract, the pinch is felt in these marginal operations, both first and most severely. Compounding these problems is the

ultimate prospect that the resource itself will be exhausted.

In this context it is no wonder that some who live in the north, and many who do not, are prepared to make some trade-offs between environmental damage and employment opportunities. Such a trade-off is defended in many ways. Many feel that in the north there are more lakes, rivers, trees, animals and rock than anyone knows what to do with. Many also argue by the balance sheet: transportation costs are higher in the north; living costs and thus labour costs are as high or higher; and tree growth is slower than in many of the regions with which northerners must compete. It might even be argued that environmental damage occurs more readily and is harder to prevent in the north than it is elsewhere. Nature is simply more vulnerable.

There is, however, something fundamentally wrong with all these arguments. They all rest in part on a false assumption. The Conservation Council believes that care for the environment, if carefully planned and encouraged, can result in not fewer but more jobs, not greater economic vulnerability, but greater economic diversity and stability. The Conservation Council therefore calls on the Commission to encourage a change in perceptions in the north and elsewhere on this crucial question. The economic health of Ontario's north, including its employment levels, will be best served, especially in the long term, by a program of careful environmental management--not by sacrificing the environment in the name of employment.

The Ontario Federation of Labour, one of the Conservation Council's member organizations, is well aware of the links between environmental concerns and employment levels. In the OFL's submission to the Commission at its Preliminary Hearings, OFL President Cliff Pilkey spoke of the vulnerability of northern communities:

"However, unionists in the North have learned and are presently being reminded of hard lessons from the boom and bust cycles of the past, the company towns which can die as quickly as they were set up, the pollution, the waste of raw products, the lack of health, education, and transportation facilities, the lack of jobs for women, the relocation and dislocation which occurs when a company is closed. These kinds of effects... wreak havoc on the personal and family lives of inhabitants of the North. The lack of stability is oppressive."⁴¹

The OFL brief also indicates an increasing awareness on the part of the labour movement that traditional perceptions of the link between jobs and the environment are no longer acceptable:

"...the labour movement adamantly refuses to be conned by the industry argument of the need for trade-offs between environmental control and jobs. We have learned to our detriment that the usual outcome of such an argument is both pollution and unemployment. We no longer intend to be so naive, and are becoming increasingly convinced that pollution control methods of resource and energy development must be intensively researched and examined. We believe that there are energy systems and technologies which respect the environment and are in keeping with the maintenance and development of the livelihood and lifestyle of native people. We particularly recommend that wind and solar power systems for the North be extensively studied by your Commission."⁴²

The Conservation Council supports the conclusions of the OFL as expressed in their brief to the RCNE. There is a considerable literature now available, primarily from U.S. sources, sometimes from Canadian, which the Council believes conclusively demonstrates that greater employment opportunities exist with pollution abatement than with pollution acceptance; with energy conservation than with energy production; with diverse, small-scale renewable energy sources than with large scale non-renewable sources; and with social, educational, and health services than with sacrificing those services. In Appendix X we have included a short list of some of the most important of these studies.

Measures required to regenerate the forest after logging will provide a large number of jobs for skilled and unskilled workers. Such measures can be undertaken immediately without the need for new technology. It is desirable that forest workers live in permanent communities near the forest, rather than in temporary camps.

The Council acknowledges that there may be short term job losses and dislocation, but these can and must be offset by retraining and relocation programs. Industry as well must recognize its responsibility to its workers and provide sufficient lead time in announcing layoffs or closures to enable workers, with assistance, to prepare for alternate employment.

The Conservation Council believes that new programs could lead to new employment opportunities for the north. Northern-based enterprises could be created, leading to a much-needed diversification of the northern economy. The Conservation Council would like to suggest to the Commission a four part approach to the north's jobs and environment problem.

The Conservation Council therefore recommends that:

(1) It be recognized that vigorous programs of pollution abatement can be an excellent source of employment opportunities--especially employment opportunities at the point of pollution incidence. In this regard it should also be recognized that pollution abatement offers an opportunity for some diversification of the economy of northern Ontario.

(2) It be recognized that energy conservation is an especially urgent need in northern Ontario and that all present and future energy conservation subsidy programs should be weighted to favour the north. Energy conservation provides superb opportunities for local employment creation.

(3) A program of research, development and demonstration (R.D. & D.) for small-scale, renewable energy sources suitable to northern Ontario become a top priority of government. Like energy conservation, so-called "alternate" energy is a powerful creator of economic and employment opportunities.

(4) We proceed to rectify many northern "equity" questions, eg. in health services, in transportation facilities, in educational and social services, with a second purpose in mind as well: ie., the inexpensive provision of

employment opportunities and economic diversity for the north. The Council believes that only with such changes in the northern economy will all come to see environmental protection as a priority.

The Conservation Council wishes to offer a brief discussion of the rationale behind each of these proposals.

(1) Pollution abatement often produces on-site employment for construction, and equipment installation and maintenance. Since the more fragile ecosystem of the North may need special protection, jobs and economic diversity will be aided so long as companies operating in the north are not made non-competitive by pollution abatement requirements. One way of avoiding this possibility is a special public pollution abatement subsidy to those operating in ecologically sensitive regions. This sort of program should not be launched without first seeing if the companies of the region are in fact non-competitive. The Victor-Donnan report to the Ministry of the Environment suggests that Ontario's pulp and paper industry, generally, can afford the costs of cleaning up water pollution.⁴³ A similar sort of study should be done for the mining industry--and for Northern Ontario generally. It should be noted in this regard that former Federal Environment Minister Len Marchand said in 1978:

"I know of no case in Canada where environmental controls have been the main reason for a plant having to close its doors."⁴⁴

What is important is that employment and pollution abatement not be allowed to become trade-offs in the fragile north.

(2) The Science Council of Canada has noted that insulating all homes in Canada to the extent of a five-year fuel cost payback could result in a 37% savings in fuel for space heating.⁴⁵ It has been noted that energy

conservation is by far our least expensive future fuel source. Any energy savings, of course, mean a stronger Canadian economy and less total environmental damage. Energy savings on heating make extra sense in the North. Fuel costs are higher and each unit of insulation added above the legal minimum saves more energy than it would were that unit used further south in a like manner. Energy conservation on heating is more than just insulation--it is proper furnace maintenance, furnace retro-fitting, the building of vestibules, double and triple-glazing of windows, heat recapture, district heating, etc. Such efforts would produce far more jobs per dollar spent than would expenditure of this money on the production of the energy equivalent of any conventional means. Three out of four of these jobs would be in local installation and only one out of four in manufacturing.⁴⁶ Thus even if all energy conservation materials and equipment were imported to the North there would be an enormous employment gain in the North. This importation need not, of course, be the case. The Council urges the government of Ontario to explore a supplementary program to the federal home insulation program, with special emphasis on the North.

(3) The Conservation Council is encouraged that the Commissioner is himself supportive of appropriate technologies and aware of the employment potential they offer:

"Another important thing about these forms of renewable energy is that compared to oil or nuclear energy, solar energy creates many more jobs for the same capital investment...

"Given these factors, 'appropriate technology' might make sense in the north."⁴⁷

The Conservation Council wishes to express its support of this statement. The Council believes that renewable energy from the wind, from the sun, from methane or methanol production from wood and wood wastes, and from organic

wastes generally offers particular potential in the north. Ultimately we all must learn to live from these sorts of sources--we should start the experiment in the North where potential supplies are excellent and conventional energy costs high.

(4) Finally we would like to note that many witnesses before the RCNE have argued for improved social programs in health, education and social services and for preservation and improvement of rail transportation. The studies of the Centre for Advanced Computation at the University of Illinois (see Appendix IX) have shown that all these items are both highly employment intensive and of low environmental impact. Improving such services in the north would thus have multiple positive effects.

CONCLUSION

In conclusion, the Conservation Council would like to reiterate its constant concern for the northern environment. The Council believes that if development is to occur north of 50° it must be preceded and accompanied by careful planning and safeguards for the environment. Furthermore, certain areas should be identified in which no development should occur--areas in which the environment is preserved in its natural state. Such areas should be carefully delineated and enshrined in legislation, so that those interested in developing the land, in whatever way, cannot pressure the government to change their status without recourse to public consultation and new legislation.

The Council is convinced that environmental protection and carefully controlled development can be compatible if the will exists to make them so. The Council urges the Commission to exercise that will, and to urge government and industry to do the same. Projects which are already being planned can be improved, new types of developments can be explored and innovative planning can be developed. Through all this, the voice of northerners must be heard.

REFERENCES

1. The Corporation of the Town of Sioux Lookout, Preliminary Brief to the Royal Commission on the Northern Environment, November 7, 1977.
2. United States-Canada Research Consultation Group on the Long Range Transport of Air Pollutants, The LRTAP Problem in North America: A Preliminary Overview, (1979), p.2.
3. Ibid., p.16.
4. Grand Council Treaty #3, Kenora, January 19, 1978, Transcripts of the Preliminary Hearings of the Royal Commission on the Northern Environment, p.2563A.
5. Ontario Ministry of the Environment, Acidic Precipitation in Ontario, (February, 1979), p.2.
6. J. Moody, "Acid Rain--A Recent Chronology", fact sheet contained in the information kit from the Action Seminar on Acid Precipitation, November 1-3, 1979, p.1.
7. Royal Commission on the Northern Environment, Terms of Reference, Objectives, Work Program, Second Edition, (July, 1979), p.5.
8. Dr. J. R. Kramer, Dryden, November 9, 1977, Transcripts, p.428.
9. RCNE, Terms of Reference (1979), p.5.
10. Ontario Hydro, Press Release, April 10, 1979.
11. Gary E. Glass, Impacts of Air Pollutants on Wilderness Areas of Northern Minnesota, U.S. Environmental Protection Agency, (March 6, 1979), p.1.
12. Royal Commission on the Northern Environment, Interim Report and Recommendations (April 4, 1978), p.28.
13. Personal Communication with Bryan Potts, Ontario Hydro, December 11, 1979.
14. Honourable William G. Davis, Speech to the Annual Meeting of the Cochrane Board of Trade on Northeastern Ontario Industrial Development, Cochrane, Ontario, February 9, 1979.
15. Onakawana Development Limited, Timmins, November 23, 1977, Transcripts, p.956.
16. Ministry of Natural Resources, "Information Package for Open House Public Meeting on Proposed Development of Onakawana Ignite Coal", Autumn, 1977, p.8.

17. Personal Communication with Terry Forth, Polar Gas, November 20, 1979, and January 29, 1980.
18. Polar Gas, Geraldton, November 28, 1977, Transcripts, p.1261.
19. Ontario Professional Foresters Association, Ear Falls, November 16, 1977, Transcripts, p.794.
20. For a discussion of the effectiveness and environmental dangers of spruce budworm aerial spraying see Kari Lie, "The Spruce Budworm Controversy in New Brunswick and Nova Scotia" to be published in Alternatives (Spring 1980) Vol. 9, No.2.
21. J.E.J. Fahlgren, Speech to the Hearst Chamber of Commerce, Hearst, February 7, 1979, p.2.
22. Globe and Mail, November 7, 1979, p.1 and p.B1, November 9, 1979, p.5. Toronto Star, December 1, 1979, p.1. Also: Statement by J.E.J. Fahlgren, November 9, 1979.
23. Ontario Ministry of Natural Resources, Memorandum of Understanding (October 26, 1976), p.3.
24. Ontario Legislative Debates, Supply Committee Estimates, Ministry of Natural Resources, October 27, 1976, p.S-2247.
25. Stephen Lewis, Speech on Reed Paper Ltd., presented at the St. Lawrence Centre, Toronto, October 27, 1976.
26. Honourable William G. Davis, Statement to the Legislature, (December 10, 1976), p.2.
27. Hon. William G. Davis, Newsrelease re Hartt Inquiry, (February 10, 1977), p.1.
28. Ibid., p.2.
29. Ontario, Order-in-Council 1900/77, (July 13, 1977), p.2.
30. Dr. Kenneth Hare, Toronto, December 16, 1977, Transcripts, p.2156.
31. Dr. F.K. Hare et al., The Management of Canada's Nuclear Wastes, Ottawa: Department of Energy, Mines and Resources (1977), Report EP77-6, pp.55-56.
32. Graham Saunders, untitled paper and letter to Hon. James A.C. Auld, Minister of Energy, May 25, 1979.
33. Hare Report, p.48.
34. Conservation Council of Ontario, "A Brief on Wildlife and Endangered Species Management", July 1976.

35. Conservation Council of Ontario, A Brief to the Royal Commission on Electric Power Planning, (December 19, 1977), p.21.
36. Ontario Ministry of Natural Resources, Polar Bear Provincial Park, Public Participation--A Summary of Comments, (April, 1979), p.24.
37. Red Lake Businessmen's Association, Letter to James Auld, Minister of Natural Resources, March 16, 1979.
38. Hough, Stansbury and Associates Limited, Crown Land Recreation Study - Phase 2, Ministry of Natural Resources (March 1979), p.193.
39. Carol Bailey, Environmental Guidelines for the Recreational Use of Northern Ontario's Back-Country Areas, Conservation Council of Ontario, (April 1979).
40. Ibid., p.16.
41. Ontario Federation of Labour, Preliminary Submission to the Royal Commission on the Northern Environment, Kenora, Ontario, January 17, 1978, p.4.
42. Ibid., p.6.
43. Jack Donnan and Peter Victor, Alternative Policies for Pollution Abatement: The Ontario Pulp and Paper Industry, Ontario Ministry of the Environment, 3 Volumes (1974-76), see eg. Vol. 3, pp.41-47.
44. Hon. Len Marchand, Minister of Environment Canada, Keynote address to Canadian Labour Congress, Chateau Laurier, Ottawa, February 19, 1978.
45. Science Council of Canada, Canada as a Conserver Society, Report No. 27, Ottawa: Supply and Services Canada Ltd., (1977), p.74.
46. Richard Grossman and Gail Daneker, Energy, Jobs and the Economy, Boston: Alyson Publications Inc., (1978), p.53.
47. J.E.J. Fahlgren, Speech to the Ontario Metis and Non-Status Indian Association, Thunder Bay, December 16, 1978.

Annotated List of Appendices

Appendix I

Letter from Monte Hummel, Executive Director of the World Wildlife Fund (Canada), to The Honourable John Fraser, Minister of the Environment, dated November 9, 1979. The letter includes resolutions passed at the Action Seminar on Acid Precipitation, a discussion of diplomatic manoeuvring over Marmion Lake and a statement of support from Commissioner Fahlgren.

Appendix II

Jan Macpherson and Greg Thompson, "Polar Gas: A Premature Pipeline?" from Alternatives, Vol. 7, No.4 (Autumn 1978). Includes a discussion of the limitations of the review process Polar Gas will go through.

Appendix III

Karl Lie, "The Plight of Ontario's Northern Forests" from Alternatives, Vol. 7, No.4 (Autumn 1978). A discussion of the current state of forest management in Ontario, with particular emphasis on the implications of the 1962 amendment to the Crown Timber Act, giving the provincial government the responsibility for regeneration.

Appendix IV

Brief to the Royal Commission on the Northern Environment, through the Conservation Council of Ontario, from the Ontario Professional Foresters Association, December 19, 1979.

Appendix V

A scientific note on the ecological implications of harvesting far northern forests.

Appendix VI

A discussion paper on "The Disposal of Radioactive Wastes" (by Kari Lie) detailing the disposal options available, the conclusions of the Hare Report and the Porter Commission. Particular attention is given to the extent to which Atomic Energy of Canada Ltd. (and Ontario Hydro) are committed to reprocessing.

Appendix VII

"Atikaki and Forest Alternatives" by Marc Wermager, Executive Director of the Atikaki Council. Detailed discussion of the Atikaki group's efforts to come up with something agreeable to all interested parties. Includes the Atikaki proposal to build a road from Red Lake to Kenora.

Appendix VIII

Letter from the Red Lake Businessmen's Association to James Auld, Minister of Natural Resources, dated March 16, 1979. Advises the Minister of two resolutions passed by the Businessmen's Ass.: 1) Endorsement of the Atikaki proposal for a road from Red Lake to Kenora, and 2) Request to MNR to designate the area of the Atikaki proposal as a Park Reserve, until a final decision can be made.

Appendix IX

Excerpt from the Summary of the Crown Land Recreation Study - Phase 2 by Hough, Stansbury and Associates Ltd. for the Ministry of Natural Resources, March, 1979.

Appendix X

A short bibliography (11 items) on the relationship between Jobs and the Environment.

